
CONTROLLED SUBSTANCE POLICY

PURPOSE:

To comply with State and Federal regulations regarding procurement, storage, accountability, administration and destruction of controlled substances utilized by paramedics.

To provide the guidelines for those ALS provider agencies that participate in the San Bernardino, Inyo and Mono Counties controlled substance program utilizing the San Bernardino County Health Officer's DEA number to obtain their controlled substances.

For the ALS pre-hospital provider agencies who do not participate in this program, the logs and tracking mechanisms enclosed may be utilized at your discretion.

PROCUREMENT:

The designated controlled substance coordinator from an ALS provider agency utilizing the Public Health Officer's DEA number, will obtain a controlled substance by notifying the appropriate ICEMA staff member in writing. The notification may be on agency letterhead or via e-mail. Allow approximately two weeks to process the request.

ACCOUNTING FOR CONTROLLED SUBSTANCES:

A. DAILY LOG

1. All controlled substances stored on an ALS unit must be counted each day.
2. The paramedic who is accepting responsibility (coming on duty) for the controlled substance shall examine the controlled substance for signs of damage, expiration date and document in the appropriate place on the **Daily Log**.
3. The paramedic relinquishing responsibility will co-sign in the indicated area. If a paramedic is on duty longer than twenty-four hours, the co-signer on the subsequent days shall be a superior, either a fire captain or field supervisor.
4. If a controlled substance is used during the shift, this must be noted on the Daily Log.
5. The **original Daily Log** shall be sent to ICEMA on a monthly basis.
6. A photocopy of the **Daily Log** will be maintained by the ALS provider agency for a minimum of two years.

B. STORAGE:

1. Must have a double locking mechanism.
2. The cabinet must be maintained at the physical location listed on the DEA Controlled Substance Registration Certificate.
3. The keys will be maintained and secured by the EMS Coordinator (or other designated official of the ALS provider agency). The safe keys or combination lock shall be confidential and distributed only on a need to know basis as determined by the EMS Coordinator.

C. MONTHLY LOG:

An ALS provider agency EMS Coordinator shall coordinate the replacement procedures for a controlled substance from their current inventory.

1. When a controlled substance is replaced, the paramedic should fill out the controlled substance sign-out log with the date, time, patient name, O1A form number, EMT-P name & accreditation number, name of controlled substance given, dose given, amount wasted, and then sign the appropriate space. In addition, a copy of the O1A form needs to be attached to the Monthly Log.
2. The EMS Coordinator/designee will co-sign for all replacements
3. The EMS Coordinators/designee signature indicates:
 - a. The paramedic completed the form.
 - b. The dose given was documented correctly.
 - c. The amount wasted as written is correct and agrees with the information on the O1A form
 - d. The dispensed controlled substance was given to the paramedic and placed into the ALS unit drug box and secured with a double locking device.

NOTE: If the form is not correctly filled out, the replacement is not to be given.

D. DISCREPANCIES:

A written explanation must be completed and mailed to ICEMA if:

1. Any amount of the controlled substance was wasted in any manner inconsistent with this policy.
2. Any discrepancies are noted between the sign-out sheet and the ALS run report.
3. The controlled substance is opened and not used, or the ampule is lost, damaged or destroyed

E. REPLACEMENT OF EXPIRED OR DAMAGED CONTROLLED SUBSTANCES:

If a controlled substance becomes damaged, or expired, the EMS Coordinator/designee will be notified. Any damaged or broken remnants must be disposed of properly, an explanation of the event shall be documented on the appropriate log. Two signatures are required for replacement of the controlled substance. In addition, the appropriate staff member at ICEMA shall be informed of all occurrences by the EMS Coordinator/designee.

HANDLING OF CONTROLLED SUBSTANCE SHIPMENTS

Controlled substances are to be signed for by an employee of the prehospital provider agency upon arrival. The shipment must be immediately stored in a locked area and the EMS coordinator notified of their arrival.

An inspection should be made by the EMS coordinator to insure that there are no broken or compromised products. If the product appears broken, damaged or compromised in any way, return them to the vendor along with **DEA Form 106** (Report of Theft or Loss of Controlled Substance) in quadruplicate. Forward the original and duplicate to the Riverside DEA office, Attention: Carol Winkler, **within forty-eight hours of occurrence**. Retain the triplicate copy for your records and forward the quadruplicate copy to ICEMA. Dispose of damaged or compromised controlled substances as directed by your vendor.

ORDERING OF CONTROLLED SUBSTANCES

ALS providers who do not have their own Medical Director may order a maximum three-month supply for storage at a predetermined location which is the physical address listed on the DEA application form, (*Controlled Substance Registration Certificate*)

- A. The DEA will assign a specific number to each ALS provider and the Public Health Officer. A certificate and 222 order forms will be issued directly to the ALS provider by the DEA. Upon receipt, the ALS provider must immediately **surrender to ICEMA the 222 forms**. A copy of the *Controlled Substance Registration Certificate* must be provided to ICEMA upon receipt.
- B. Each ALS provider must provide in writing to ICEMA, the name of a designated person responsible for ordering controlled substances. Orders for morphine will only be accepted from this person. ICEMA must be notified in writing immediately of any change of this designated individual.
- C. Controlled substances may only be purchased from one vendor. The name of the vendor must be provided in writing to ICEMA. If the ALS provider at any time wishes to change vendors, a letter indicating that choice must be sent to ICEMA. Authorization letters are sent to vendors indicating those ALS agencies who have requested to purchase controlled substances from them.
- D. To order morphine the designated person must contact the ICEMA designated individual by telephone or in writing, and list the amount of morphine to be ordered. The ICEMA designated individual will be responsible for completing the 222 Form and obtaining the signature of the Public Health Officer.
- E. The original Monthly and Daily logs shall be sent to ICEMA each month for review and storage.
- F. The ALS agency supply of controlled substances shall be stored at the address listed on DEA registration certificate.
- G. ICEMA and/or the Public Health Officer may, initiate an investigation at any time it may be deemed necessary to assure the appropriate control of controlled substances.

All providers should obtain a copy of "*Physicians Manual---An Informational Outline of the Controlled Substances Act of 1970*" (Revised March 1990) Copies can be ordered through the Riverside DEA office (909) 328-6200.